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Attorneys for Defendant Shamo

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

AARON MICHAEL SHAMO,
DREW WILSON CRANDALL,
ALEXANDRYA TONGE,
KATHERINE BUSIN,
MARIO NOBLE, and
SEAN GYGI,

Defendants.

**MOTION TO EXTEND TIME TO FILE
MOTIONS REGARDING
AUTHENTICATION ISSUES AND
COMPUTER FORENSIC MATTERS**

Case No. 2:16-CR-00631-DAK

Judge Dale Kimball

Defendant, Aaron Michael Shamo, by and through his attorney of record, Gregory G. Skordas, hereby moves this Court for a four-week extension of time to file any motions regarding authentication issues for records obtained from the “dark web” and motions regarding

issues currently being examined by a computer forensic specialist. Defendant bases this motion on the following grounds:

1. In December 2018, the Government provided Defendant Shamo's counsel with an estimated 20 TBs of computer and electronic data.
2. Defendant Shamo's Counsel is CJA-Appointed and is required to seek budget approval for matters in this case.
3. Defendant Shamo's Counsel had retained the services of a computer forensic company to examine previous issues related to electronic data.
4. After receipt of the new discovery, Counsel sought to have that same company, who was familiar with the case, review an estimated 4 TBs of that new data, which Counsel felt was necessary for the defense of Mr. Shamo.
5. Beginning in January 2019, Counsel attempted to obtain approval for the forensic review of that computer data, but such approval was not initially given.
6. In February 2019, Counsel was instructed to seek a new computer forensic company by the Tenth Circuit budgeting attorney, Cari Waters.
7. On March 27, 2019, after numerous phone calls and emails, Counsel was given budgeting approval for the services Trial Tech to review that newly provided computer data.
8. Trial Tech is still in the process of reviewing that provided data and will need time to provide reports and available information on those devices.
9. The receipt of those reports and information would likely serve as the basis for several motions.

10. Counsel for the Government, Michael Gadd, has stipulated to this Motion to Extend via email.

WHEREFORE, Defendant respectfully requests a four- week extension of time to file an the above-outlined motions.

DATED this 23rd Day of April, 2019.

SKORDAS & CASTON, LLC

/s/ Gregory G. Skordas

Gregory G. Skordas

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of April, 2019, I filed a true and correct copy of the foregoing **STIPULATED MOTION TO EXTEND TIME TO FILE MOTIONS REGARDING AUTHENTICATION AND COMPUTER FORENSIC MATTERS** with the Clerk of the Court using CM/ECF system, which sent notification of such filing to the following:

S. Michael Gadd
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/s/ Sabrina Nielsen-Legal Secretary
SKORDAS & CASTON, LLC